

PHILLIP A. TALBERT  
United States Attorney  
SAM STEFANKI  
Assistant United States Attorney  
501 I Street, Suite 10-100  
Sacramento, CA 95814  
Telephone: (916) 554-2700  
Facsimile: (916) 554-2900

Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
CHALONER SAINTILLUS,  
  
Defendant.

CASE NO. 2:20-CR-00213-KJM  
  
STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
[PROPOSED] FINDINGS AND ORDER  
  
DATE: August 1, 2022  
TIME: 9:00 a.m.  
COURT: Hon. Kimberly J. Mueller

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record, and defendant Chaloner Saintillus, by and through his counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on August 1, 2022.
2. By this stipulation, defendant now moves to continue the status conference until August 15, 2022, and to exclude time between August 1, 2022, and August 15, 2022, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
  - a) The government has represented that the discovery associated with this case includes hundreds of pages of investigative reports, laboratory test results, images, and electronic evidence. All of this discovery has been either produced directly to counsel and/or made available for inspection and copying.

///

1           b) Counsel for the defendant was appointed relatively recently and desires additional  
2 time to consult with his client, review the current charges, conduct investigation and research  
3 related to the charges, review discovery, discuss potential resolutions with his client, and  
4 otherwise prepare for trial.

5           c) Counsel for the defendant believes that failure to grant the above-requested  
6 continuance would deny him the reasonable time necessary for effective preparation, taking into  
7 account the exercise of due diligence.

8           d) The government does not object to the continuance.

9           e) Based on the above-stated findings, the ends of justice served by continuing the  
10 case as requested outweigh the interest of the public and the defendant in a trial within the  
11 original date prescribed by the Speedy Trial Act.

12           f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
13 et seq., within which trial must commence, the time period of August 1, 2022 to August 15,  
14 2022, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code  
15 T4] because it results from a continuance granted by the Court at the defendant's request on the  
16 basis of the Court's finding that the ends of justice served by taking such action outweigh the  
17 best interest of the public and the defendant in a speedy trial.

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: July 19, 2022

PHILLIP A. TALBERT  
United States Attorney

/s/ SAM STEFANKI  
SAM STEFANKI  
Assistant United States Attorney

Dated: July 19, 2022

/s/ DAVID D. FISCHER  
DAVID D. FISCHER  
Counsel for Defendant  
CHALONER SAINTILLUS

**[PROPOSED] ORDER**

IT IS SO FOUND AND ORDERED this \_\_\_\_ day of July, 2022.

THE HONORABLE KIMBERLY J. MUELLER  
Chief United States District Judge